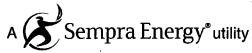


Amy Kitson Storage Engineering Manager

12801 Tampa Avenue Northridge, CA 91326

(818) 701-3291 akitson@semprautilities.com

**VIA COURIER** 



February 29, 2016

Attn: Joshua Cwikla

Los Angeles Regional Water Quality Control Board 320 W. Fourth Street Suite 200 Los Angeles, CA 90013

Subject: Investigative Order No R4-2015-0300 – Supplemental Response 1

Mr. Cwikla:

On February 18, 2016, Southern California Gas Company ("SoCalGas") submitted a letter and attached a "Technical Report" in response to the Los Angeles Regional Water Quality Control Board's ("Regional Board") December 18, 2015 order (the "13267 Letter") to submit information related to the disposal of well drilling fluids, well completion fluids and well production fluids from SoCalGas's oil and gas operations in Los Angeles and Ventura County, California. In that response, we indicated that SoCalGas's investigation efforts were ongoing and that we would supplement our February 18, 2016 response and provide certain additional remediation closure reports. We are providing such supplemental information with this report.

Specifically, we are providing additional information<sup>1</sup> in response to the following information requests contained in the 13267 Letter:

- Regional Board Request: 1) The locations of all current and historic sumps in your area of operations used in the discharge of fluids to land. Provide all information regarding liner material used with each sump, if any. Provide the status of all sumps, including active, inactive, closed with cleanup, closed without cleanup, or unknown. For sumps closed with cleanup, describe the cleanup activities and cleanup level.
- Regional Board Request: 2) The procedures you use to close or abandon sumps, or otherwise cease their operation.
- Regional Board Request: 6) The location of any domestic, municipal, and commercial water wells within a half-mile radius of any current or historic sump.

<sup>&</sup>lt;sup>1</sup> The information and reports provided herein supplement SoCalGas's February 18, 2016 Technical Report.

With respect to Regional Board Request 1, we are submitting narratives regarding a number of historical sumps at the Aliso Canyon Gas Storage Facility (the "Facility") along with information in the form of Attachment B to the 13267 Letter. We are also submitting a October 2007 report from Eco Environmental Associates ("Eco"), which investigated "abandoned oil field sumps" designated 14 through 23 within the western portion of the Facility.

With respect to Regional Board Request 2, we are providing a "Draft Remediation" Closure Report" for Sumps 15, 21, and 22 and a summary report of remediation efforts at Sump 2, each prepared by Eco.

With respect to Regional Board Request 6, as discussed in our February 18, 2016 Technical Report, SoCalGas engaged a third party consultant (Geosyntec) to determine whether or not any domestic, municipal, and commercial water wells existed within ½ mile of the Facility. Geosyntec reviewed available historical aerial photographs, topographic maps, and Department of Water Resources and Regional Board databases for indications of past or existing groundwater wells near the Facility. No groundwater wells were identified within ½ mile of the Facility, with the exception one well plotted on a 1979 topographic map approximately 1/4-mile north of the northern Facility boundary. The well, if still present, would be located north of the topographic divide, and would not share the same watershed as the Facility.

Please note that SoCalGas's investigation efforts are ongoing. The response set forth herein and the attached documents provided are based upon the information available to SoCalGas at the time of this submittal. SoCalGas may supplement this response with additional information regarding historical sumps at the Facility. SoCalGas is also continuing to investigate whether or not there are other historical sumps at its other Los Angeles County storage facilities and will provide additional responsive information if uncovered.

Furthermore, continued investigation may cause our February 18, 2016 response or this response to be incomplete or subject to amendment or modification. SoCalGas,

therefore, reserves its right to amend or further supplement the February 18, 2016	
response or this response and submit additional documents in the event of new or	
additional information and/or changed circumstances.	
ŭ	
Sincerely,	

Amy Kitson

Enclosures

## **Certification Statement**

I, Amy Kitson, certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of the those individuals immediately responsible for obtaining the information, I believe that the information is true and accurate. SoCalGas is continuing its investigation to ensure the information is complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.